



Office of
COUNTY CLERK

500 S. Gillette Avenue, Suite 1600 • P.O. Box 3010 • Gillette, Wyoming 82717-3010
Phone: 307.682.7285 • Fax: 307.687.6455

September 9, 2022

Hon. Edward Buchanan
Wyoming Secretary of State
Elections Division
Herschler Building East
Cheyenne, Wyoming 82002
SecOfState@wyo.gov

Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, D.C. 20463
EnfComplaint@fec.gov

Re: Complaint regarding Coal Country Conservatives Political Action Committee

Dear Secretary of State Buchanan and Office of General Counsel:

I respectfully submit this complaint and supporting exhibits to highlight my concerns about the activities of the Coal Country Conservatives Political Action Committee (CCCPac) during the 2022 Wyoming Primary Election.

I have served as the Campbell County Clerk since 1995 and been a member of the Clerk's office since 1980. It is my professional judgement the organization of these entities and their subsequent activities can, at best, be described as a scheme to thwart transparency in a way that is deceptive to the public and may be illegal. Furthermore, I believe these activities had a material impact on numerous races in Campbell County's 2022 Primary Election. As such, I request a swift and robust investigation be undertaken by the Wyoming Secretary of State's Office (WYSOS) and Federal Election Commission (FEC) to ensure CCCPac is in full compliance for its activities to date and remains so during the 2022 General election.

Background:

- On May 18, 2022, the WYSOS approved the incorporation of CCCPac as a profit corporation. (Exhibit 1)
- Also on May 18, 2022, CCCPac filed as a political action committee with the FEC (Coo815498.) (Exhibit 2a) The filing was amended on June 23, 2022. (Exhibit 2b)
- Both entities list Colleen McCabe as the Treasurer and Laura Cox as the Registered Agent.
- On August 2, 2022, the FEC issued a RFAI letter (I.D. number: C00815498) regarding CCCPac's failure to file its July Quarterly Report. (Exhibit 3)
- CCCPac caused mailers to be sent to the voters through the United States Postal Service in advance of the 2022 Primary. (Exhibit 4) Advertising was also placed in a local print magazine. (Exhibit 5)
- Materials associated with CCCPac were distributed on the Courthouse steps on at least one day during the absentee voting period and I requested the activity cease. It was also reported to me by the Elections staff that a voter showed them similar materials during the absentee voting period and told the staff the materials were distributed to the voter at their church.

Concerns:

1. The first question that needs to be answered is who engaged in the electioneering activities? Was it the Wyoming Corporation exercising its First Amendment rights (CCCPac1), the federal PAC (CCCPac2) or some combination? The mailer contains a disclaimer "Paid for by the Coal Country Conservatives Political Action Committee." This question necessarily requires the source of all contributions and expenditures for each entity be examined to determine each one's role, and if the contribution sources are legal and whether any expenditure limits apply.
2. Next, does Wyoming Statute, W.S. 22-25-106(g) relieve CCCPac1 of all legal requirements under State law or just those associated with the federal candidate, or only with the filing requirement itself? This question is relevant as the electioneering materials CCCPac distributed lists only one federal candidate and numerous statewide, legislative, local and precinct candidates. Federal guidance indicates that while a federal PAC may file solely with the FEC, it is State election officials who are responsible for legal oversight and compliance of the non-federal races. As such, neither of the CCCPac entities are compliant with W.S. 22-25 106(h) regarding independent expenditures as no filing has been made to date with the WYSOS or FEC.
3. If WYSOS is responsible for non-federal races, an immediate review of all CCCPac activities is prudent. Of particular interest is whether CCCPac coordinated with or contributed, directly or through a third person, to any candidate or candidate committee, including write-in candidates, or caused other electioneering activities or independent expenditures to occur.
4. CCCPac2 is a non-connected PAC according to its FEC filing. This seems dubious as the officers for both are identical.

5. The FEC has issued a letter regarding CCCPac2's failure to file its Quarterly report. It seems likely that additional filings may also be due, including potentially a 12 Day Pre-Primary Report, a 24 and/or 48 Hour Independent Expenditure Report, or a Last Minute Independent Expenditure Report.
6. Additionally, did CCCPac1 and CCCPac2 meet relevant Internal Revenue Service requirements?

I thank you for your immediate attention to this matter. Elections are sacred in our form of government. The citizens' trust in elections, and those wishing to properly influence them, is tarnished when actors like Coal Country Conservatives Political Action Committee fail to comply with reasonable requirements that ensure accountability and transparency.

Again, the need for a timely and complete investigation and resolution using all the tools at your disposal is paramount as the potential for continued activities by CCCPac presents a clear and present danger to the integrity of the 2022 General election and the rule of law in Campbell County.

Sincerely,



Susan F. Saunders

Campbell County Clerk

Susan.saunders@campbellcountywy.gov

cc via email:

Honorable Governor Mark Gordon

Wyoming Attorney General Bridget Hill

Campbell County Attorney Mitch Damsky

Malcolm Ervin, President of the Wyoming County Clerks Association

President of the Senate Dan Dockstader

Speaker of the House Eric Barlow

Senator Ogden Driskill, Chairman, Corporations, Senate Elections and Political Subdivisions Committee

Representative Dan Zwonitzer, Chairman, House Corporations, Elections and Political Subdivisions Committee

Enclosures:



Wyoming Secretary of State
Herschler Bldg East, Ste.100 & 101
Cheyenne, WY 82002-0020
Ph. 307-777-7311

For Office Use Only

WY Secretary of State
FILED: May 18 2022 3:53PM
Original ID: 2022-001116253

Profit Corporation Articles of Incorporation

- I. The name of the profit corporation is:
Coal Country Conservatives Political Action Committee
- II. The name and physical address of the registered agent of the profit corporation is:
Laura Cox
4000 Force Road
Gillette, WY 82718
- III. The mailing address of the profit corporation is:
P.O. Box 813
Gillette, WY 82717-0813
- IV. The principal office address of the profit corporation is:
P.O. Box 813
Gillette, WY 82717-0813
- V. The number, par value, and class of shares the profit corporation will have the authority to issue are:
Number of Common Shares: 10 Common Par Value: \$1.0000
Number of Preferred Shares: 10 Preferred Par Value: \$1.0000
- VI. The name and address of each incorporator is as follows:
Colleen F. McCabe
P.O. Box 2418, Gillette, WY 82717-2418

Laura Cox
4000 Force Road, Gillette, WY 82718

Signature: Colleen F. McCabe
Print Name: Colleen F. McCabe
Title: Financial Officer/Treasurer
Email: colleenmccabe9@hotmail.com
Daytime Phone #: (307) 660-5798

Date: 05/18/2022





Wyoming Secretary of State
Herschler Bldg East, Ste.100 & 101
Cheyenne, WY 82002-0020
Ph. 307-777-7311

- ☒ I am the person whose signature appears on the filing; that I am authorized to file these documents on behalf of the business entity to which they pertain; and that the information I am submitting is true and correct to the best of my knowledge.
- ☒ I am filing in accordance with the provisions of the Wyoming Business Corporation Act, (W.S. 17-16-101 through 17-16-1804) and Registered Offices and Agents Act (W.S. 17-28-101 through 17-28-111).
- ☒ I understand that the information submitted electronically by me will be used to generate Articles of Incorporation that will be filed with the Wyoming Secretary of State.
- ☒ I intend and agree that the electronic submission of the information set forth herein constitutes my signature for this filing.
- ☒ I have conducted the appropriate name searches to ensure compliance with W.S. 17-16-401.
- ☒ I affirm, under penalty of perjury, that I have received actual, express permission from each of the following incorporators to add them to this business filing: Colleen F. McCabe, Laura Cox
- ☒ I consent on behalf of the business entity to accept electronic service of process at the email address provided with Article IV, Principal Office Address, under the circumstances specified in W.S. 17-28-104(e).

Notice Regarding False Filings: Filing a false document could result in criminal penalty and prosecution pursuant to W.S. 6-5-308.

W.S. 6-5-308. Penalty for filing false document.

(a) A person commits a felony punishable by imprisonment for not more than two (2) years, a fine of not more than two thousand dollars (\$2,000.00), or both, if he files with the secretary of state and willfully or knowingly:

(i) Falsifies, conceals or covers up by any trick, scheme or device a material fact;

(ii) Makes any materially false, fictitious or fraudulent statement or representation; or

(iii) Makes or uses any false writing or document knowing the same to contain any materially false, fictitious or fraudulent statement or entry.

- ☒ I acknowledge having read W.S. 6-5-308.

Filer is: ☒ An Individual ☐ An Organization

Filer Information:

By submitting this form I agree and accept this electronic filing as legal submission of my Articles of Incorporation.

Signature: Colleen F. McCabe
Print Name: Colleen F. McCabe
Title: Financial Officer/Treasurer
Email: colleenmccabe9@hotmail.com
Daytime Phone #: (307) 660-5798

Date: 05/18/2022



Wyoming Secretary of State
Herschler Bldg East, Ste. 100 & 101

Cheyenne, WY 82002-0020
Ph. 307-777-7311

Consent to Appointment by Registered Agent

Laura Cox, whose registered office is located at **4000 Force Road, Gillette, WY 82718**, voluntarily consented to serve as the registered agent for **Coal Country Conservatives Political Action Committee** and has certified they are in compliance with the requirements of W.S. 17-28-101 through W.S. 17-28-111.

I have obtained a signed and dated statement by the registered agent in which they voluntarily consent to appointment for this entity.

Signature: **Colleen F. McCabe**
Print Name: **Colleen F. McCabe**
Title: **Financial Officer/Treasurer**
Email: **colleenmccabe9@hotmail.com**
Daytime Phone #: **(307) 660-5798**

Date: **05/18/2022**

STATE OF WYOMING
Office of the Secretary of State

I, EDWARD A. BUCHANAN, Secretary of State of the State of Wyoming, do hereby certify that the filing requirements for the issuance of this certificate have been fulfilled.

CERTIFICATE OF INCORPORATION

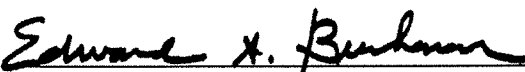
Coal Country Conservatives Political Action Committee

I have affixed hereto the Great Seal of the State of Wyoming and duly executed this official certificate at Cheyenne, Wyoming on this **18th** day of **May, 2022** at **3:53 PM**.

Remainder intentionally left blank.



Filed Date: 05/18/2022



Secretary of State

Filed Online By:

Colleen F. McCabe

on 05/18/2022

[HOME](#) / [CAMPAIGN FINANCE DATA](#) / [COMMITTEE DETAILS](#) / HTML VIEWER

FEC FORM 1

STATEMENT OF ORGANIZATION

FILING FEC-1595145

1. Coal Country Conservatives Political Action Committee

4000 Force Rd.
Gillette, WY 82718
Email: coalcountryconservatives@gmail.com

2. Date: 05/18/2022

3. FEC Committee ID #: C00815498

This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

Affiliated Committees/Organizations

NONE

, _____

Custodian of Records:

Colleen McCabe
917 Greenwood
Gillette, WY 82716
Title: Treasurer
Phone # (307) 660-5798

Treasurer:

Colleen McCabe
917 Greenwood
Gillette, Wyoming 82716
Title: Treasurer
Phone # (307) 660-5798



Designated Agent(s):

Laura Lee Cox
4000 Force Rd
Gillette, Wyoming 82718
Title: President
Phone # (307) 939-3082

Banks or Depositories

First National Bank of Gillette
P.O. Box 3002
Gillette, Wyoming 82717

Signed: Colleen McCabe
Date Signed: 05/18/2022

(End FEC FORM 1)

Generated Sun Sep 4 06:11:24 2022

Federal Election Commission, 1050 1st Street, NE, Washington, DC 20463 (800) 424-9530 In Washington (202) 694-1000

For the hearing impaired, TTY (202) 219-3336 Send comments and suggestions about this site to:
webmanager@fec.gov.

2062 #2a

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FEC FORM 1

STATEMENT OF ORGANIZATION

FILING FEC-1605203

1. Coal Country Conservatives Political Action Committee

4000 Force Rd.
Gillette, WY 82718
Email: coalcountryconservative@gmail.com;lauralee0307@reagan.com

2. Date: 05/18/2022

3. FEC Committee ID #: C00815498

This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

Affiliated Committees/Organizations

NONE

, _____

Custodian of Records:

Colleen McCabe
917 Greenwood
Gillette, WY 82716
Title: Treasurer
Phone # (307) 660-5798

Treasurer:

Colleen McCabe
917 Greenwood
Gillette, Wyoming 82716
Title: Treasurer
Phone # (307) 660-5798



Designated Agent(s):

Laura Lee Cox
4000 Force Rd
Gillette, Wyoming 82718
Title: President
Phone # (307) 939-3082

Banks or Depositories

First National Bank of Gillette
P.O. Box 3002
Gillette, Wyoming 82717

Signed: Colleen McCabe
Date Signed: 06/23/2022

(End FEC FORM 1)

Generated Sat Sep 3 09:49:59 2022

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webmanager@fec.gov.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

August 2, 2022

MCCABE, COLLEEN, TREASURER
COAL COUNTRY CONSERVATIVES POLITICAL ACTION COMMITTEE
4000 FORCE RD.
GILLETTE, WY 82718

IDENTIFICATION NUMBER: C00815498

REFERENCE: JULY QUARTERLY REPORT (05/18/2022 - 06/30/2022)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a)

It is important that you file this report immediately with the Federal Election Commission, 1050 First Street, NE, Washington, DC 20002. Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report or relevant portions must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Christopher Ritchie in the Reports Analysis Division on our toll-free number (800)424-9530. The analyst's direct number is (202)694-1146.



COAL COUNTRY CONSERVATIVES POLITICAL ACTION COMMITTEE

Page 2 of 2

Sincerely,

Debbie Chacona

Deborah Chacona
Assistant Staff Director

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2062 - 06#3



2022 Campbell County Conservative Voter Guide—Republican Primary Election

NATL US House of Representatives Harriet Hageman

STATE-WIDE

WY Governor	Brent Bien
WY Secretary of State	Chuck Gray
WY State Auditor	Unopposed
WY State Treasurer	Curt Meier
WY Superintendent of Public Instruction	Brian Schroeder

CAMPBELL COUNTY

CC Commissioner	Butch Knutson
CC Commissioner	Kelley McCreery
CC Coroner	Paul Wallem
CC Attorney	Nathan Henkes
CC Sherriff	Janaia Hyland
CC Clerk	Cindy Lovelace
CC Treasurer	Unopposed
CC Assessor	Unopposed
CC Clerk of District Court	Pamela Merchen

**CC REPRESENTATION
IN CHEYENNE**

WY State Senator District 1 Roger Connett

WY State Representative District 52 Reuben Tarver

**CITY OF
GILLETTE**

Mayor	Jarik Dudley
Council Ward I (unexpired 2 yr term)	Benjamin Decker
Council Ward I (4 yr term)	No Recommendation
Council Ward II	Mark Juneke

REMINDER: Your address will determine which City Council Ward will be on your ballot.

CC Republican Party Precincts

1-2 Write In: Jen Farnes	6-1 Jason McJilton
1-12 Ed Rebich	Derrick Mitchell
Write In: Lyle Austin	Michelle Mitchell
Terra Garrison	Angie Clark
Write In: Marlys Austin	7-1 Hesston Krause
2-1 Jacob Dalby	Linzee Krause
Kimberly Glass Dalby	8-1 Justin Mader
4-1 Darron Boltin	Janet Mader
Paul Brunner	18-1 Steve Bricker
Joe Kissack	Michael Elmore
Kelley Boltin	Linda Bricker
Mary Brunner	22-1 John Martin
Amity Kissack	Sherry Martin
	Starlitt Schmitz

REMINDER: Your address will determine which Precinct is on your ballot.

CCC PAC
PO Box 813
Gillette, WY 82717

MRKT MAIL
U.S. POSTAGE
PAID
GILLETTE, WY
PERMIT NO. 250

EXHIBIT

4

2 pages 1 & 2

Vote matters

We in America do not have government by the majority—we have government by the majority who participate...all tyranny needs to gain a foothold is for men of good conscience to remain silent." ~Thomas Jefferson



2022 Campbell County Conservative Voter Guide—Republican Primary Election

NATL

US House of Representatives Harriet Hageman

REMINDER: Your address will determine which City Council Ward will be on your ballot.

STATE-WIDE

WY Governor Brent Bien
WY Secretary of State Chuck Gray
WY State Auditor Unopposed
WY State Treasurer Curt Meier
WY Superintendent of Public Instruction Brian Schroeder

**CC REPRESENTATION
IN CHEYENNE**

WY State Senator District 23

**WRITE IN:
Patricia Junek**

EXAMPLE
☐ Eric Barlow
☒ Patricia Junek

WY State Representative District 3

Abby Angelos

CAMPBELL COUNTY

CC Commissioner Butch Knutson
CC Commissioner Kelley McCreery
CC Coroner Paul Wallem
CC Attorney Nathan Henkes
CC Sherriff Janaia Hyland
CC Clerk Cindy Lovelace
CC Treasurer Unopposed
CC Assessor Unopposed
CC Clerk of District Court Pamela Merchen

**CITY OF
GILLETTE**

Mayor Jarik Dudley
Council Ward II Mark Junek
Council Ward III Ed Sisti

**CITY OF
WRIGHT**

Mayor No Recommendation
Councilman Justin Robb
Councilman No Recommendation


CC Republican Party Precincts

1-26 No Recommendations	14-1 Doug Schrader
1-27 Ernie West	Connie L Bulkley
Shawn Sullivan	14-2 No Recommendations
Earl F Collier	19-1 Shawn Kistler
Chelsea Collier	Stacy Kistler
Karyl Meyer	23-1 Garry G Becker
Rebecca Painter West	Matthew Vercimak
3-1 John Haivala	Ryan Walker
Joshua Smithen	Amy Vercimak
Write In: Larry Mills	Jessica Walker
Nicki Haivala	Write In: Cheryl Morrison
Nita Rieniets	
Write In: Tiffany Mills	
13-1 Robert Jordan	24-1 Dean Smith
Rita Jordan	Laura Smith

REMINDER: Your address will determine which Precinct is on your ballot.

CCC PAC
PO Box 813
Gillette, WY 82717

MRKT MAIL
U.S. POSTAGE
PAID
GILLETTE, WY
PERMIT NO. 250


We in America do not have government by the majority—we have government by the majority who participate...all tyranny needs to gain a foothold is for men of good conscience to remain silent." ~Thomas Jefferson

Your ☒ vote matters
208 2 #1



2022 Campbell County Conservative Voter Guide—Republican Primary Election

NATL	US House of Representatives	Harriet Hageman	REMINDER: Your address will determine which Senate District, House District, or City Ward will be on your ballot.		
STATE-WIDE	WY Governor	Brent Bien	CC REPRESENTATION IN CHEYENNE	WY State Senator District 1	Roger Connett
	WY Secretary of State	Chuck Gray		WY State Senator District 23	WRITE IN: Patricia Juneke
	WY State Auditor	Unopposed		WY State Representative District 31	John Bear
	WY State Treasurer	Curt Meier		WY State Representative District 32	Timothy Hallinan
	WY Superintendent of Public Instruction	Brian Schroeder		WY State Representative District 52	Reuben Tarver
				WY State Representative District 53	Christopher Knapp
CAMPBELL COUNTY	CC Commissioner	Butch Knutson	CITY OF GILLETTE	Mayor	Jarik Dudley
	CC Commissioner	Kelley McCreery		Council Ward I (complete 4 yr term)	No Recommendation
	CC Corner	Paul Wallem		Council Ward I (4 yr term)	Ben Decker
	CC Attorney	Nathan Henkes		Council Ward II	Mark Juneke
	CC Sherriff	Janaia Hyland		Council Ward III	Ed Sisti
	CC Clerk	Cindy Lovelace			
	CC Treasurer	Unopposed	CITY OF WRIGHT	Mayor	No Recommendation
	CC Assessor	Unopposed		Councilman	Justin Robb
	CC Clerk of District Court	Pamela Merchen		Councilman	No Recommendation

CC Republican Party Precincts

REMINDER: Your address will determine which Precinct is on your ballot.

Paid for by Coal Country Conservatives Political Action Committee

1-1 Ben Decker Kelly Peters Write in: Dub Garst Carolyn Waldrop Write In: Beverly Garst	1-16 No Recommendations	1-25 George Dunlap Darren Lynde Troy McKeown Rhona Crone Dawn Marie Dunlap	7-1 Heston Krause Linzee Krause
1-2 Write In: Jen Farnes	1-17 Scott Clem Write In: Gene Bertch Chelsie Clem Holly Galloway Michelle Leiker	1-26 No Recommendations	8-1 Justin Mader Janet Mader
1-3 No Recommendations	1-18 Samuel Dembek Lee Shafer Donna Shafer	1-27 Ernie West Shawn Sullivan Earl F Collier Chelsea Collier Gail Heath Karyl Meyer	9-1 No Recommendations
1-5 Jose Galarza John Howard Karen Galarza Sue Howard	1-19 Tim Hallinan Kurt Siebenaler Dean Vomhoff Mary Horning Lauren Tryon Cheryl Vomhoff	2-1 Jacob Dalby Kimberly Glass Dalby	13-1 Robert Jordan Rita Jordan
1-7 Del Shelstad Write In: Doug Farrow Wanda Lieneman Nichole Shelstad Write In: Rita Farrow	1-20 David Cox Nathan Hixson Laura Cox	3-1 John Haivala Joshua Smithen Write In: Larry Mills Nicki Haivala Nita Rieniets Write In: Tiffany Mills	14-1 Doug Schrader Connie L Bulkley
1-9 Charles Butler III Sara Painter	1-21 Jarik Dudley Autum Dudley Patricia Shackelford	4-1 Darren Boltin Paul Brunner Joe Kissack Kelley Boltin Mary Brunner Amity Kissack	14-2 No Recommendations
1-12 Ed Rebich Write In: Lyle Austin Terra Garrison Write In: Marlys Austin	1-22 John Bear Sage Bear George Hixon Mark Juneke Russell W Kliche Priscilla Hixson Patricia Juneke Rebecca Shurman	6-1 Jason McJilton Derrick Mitchell Michelle Mitchell	18-1 Steve Bricker Michael Elmore Linda Bricker
1-14 Paula Wipf	1-23 Bill Brown		19-1 Shawn Kistler Stacy Kistler
1-15 Bob Hollander David Horning Ed Sisti Patricia Collins Susan Sisti Mandy Steward			22-1 John Martin Sherry Martin Starlitt Schmitz
			23-1 Chad Beeman Matt Vercimak Ryan Walker Amy Vercimak Jessica Walker
			24-1 Dean Smith Laura Smith
			26-1 Steve Dutton Rachel Dutton

EXHIBIT

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